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February 10, 2022

VIA ECF

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Sjunde AP-Fonden, et al. v. Gen. Elec. Co., et al., Case No. 17-cv-8457 (JMF)

Dear Judge Furman:

Pursuant to Rules 7(B) and 7(C) of Your Honor's Individual Rules and Practices in Civil Cases ("Individual Practices"), Standing Order 19-MC-583, and Section 6 of the Southern District of New York Electronic Case Filing Rules & Instructions, Lead Plaintiff Sjunde AP-Fonden and additional plaintiff The Cleveland Bakers & Teamsters Pension Fund ("Plaintiffs") respectfully seek leave to file with redactions their contemporaneously filed Reply Memorandum of Law in Further Support of Plaintiffs' Motion For Leave To File A Sixth Amended Consolidated Class Action Complaint ("Reply") and to file under seal materials attached as Exhibits 1-4, which have been designated by Defendants as "Confidential" pursuant to the Stipulated Protective Order (ECF No. 227).

Plaintiffs informed Defendants that they intended to file the Reply and accompanying Exhibits with redactions or under seal pursuant to Rules 7(C)(ii) and 7(C)(iii) of Your Honor's Individual Practices. Accordingly, Plaintiffs have contemporaneously filed the Reply with redactions, and the Exhibits under seal, on ECF.

For these reasons, Plaintiffs respectfully request the Court grant their request for leave to file the Reply with redactions and the Exhibits under seal pending the Court's evaluation of a letter submission by Defendants explaining and justifying the need to redact reference to these documents in Plaintiffs' filings pursuant to Rule 7(C)(i) of Your Honor's Individual Practices, which the Court has indicated it will resolve when ruling on Plaintiffs' Motion For Leave To File A Sixth Amended Consolidated Class Action Complaint (*see, e.g.*, ECF No. 301).

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Sharan Nirmul". The signature is fluid and cursive, with the first name "Sharan" and last name "Nirmul" clearly distinguishable.

Sharan Nirmul

cc: All counsel of record (VIA ECF and email)

The motion to seal is granted temporarily. The Court will assess whether to keep the materials at issue sealed or redacted when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 307. SO ORDERED.

A handwritten signature in black ink, appearing to read "Jesse M. Furman". The signature is fluid and cursive, with the first name "Jesse" and last name "Furman" clearly distinguishable.

February 11, 2022